

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

CHESTER TSANG, Individually and On Behalf of)
All Others Similarly Situated,) **CIVIL ACTION NO. 07-CV-8706-JGK**
)
Plaintiff,) "ECF CASE"
)
vs.)
)
LDK SOLAR CO., LTD., Xiaofeng Peng, Xingxue)
Tong, Liangbao Zhu, Yonggang Shao, Gang Wang,)
Jack Lai, and Qiqiang Yao,)
)
Defendants.)
)
)
WEICHEN G. LUI, Individually and On Behalf of)
All Others Similarly Situated,) **CIVIL ACTION NO. 07-CV-8766-JGK**
)
Plaintiff,) "ECF CASE"
)
vs.)
)
LDK SOLAR CO., LTD., XIAOFENG PENG,)
XINGXUE TONG, LIANGBAO ZHU,)
YONGGANG SHAO, GANG WANG, LOUIS)
T. HSIEH, JACK LAI, NICOLA SARNO,)
YUEPENG WAN, RONGQIANG CUI,)
PIETRO ROSSETTO, QIQIANG YAO,)
)
Defendants.)
)

(additional caption on following page)

**MOTION OF WEICHEN G. LUI TO CONSOLIDATE,
TO BE APPOINTED LEAD PLAINTIFF, AND
FOR APPROVAL OF HIS SELECTION OF LEAD COUNSEL**

ISMAEL HALIDOU, Individually and On Behalf of All Others Similarly Situated,))
		CIVIL ACTION NO. 07-CV-9745-JGK
Plaintiff,))
		“ECF CASE”
vs.))
)
LDK SOLAR CO., LTD., XIAOFENG PENG,))
XINGXUE TONG, LIANGBAO ZHU,))
YONGGANG SHAO, GANG WANG, LOUIS))
T. HSIEH, JACK LAI, NICOLA SARNO,))
YUEPENG WAN, and QIQIANG YAO,))
)
Defendants.))
)

PLEASE TAKE NOTICE that Plaintiff Weichen G. Lui (“Movant”) hereby moves the Court for an Order pursuant to Rule 42 of the Federal Rules of Civil Procedure, consolidating all related actions for all purposes. In addition, Movant moves this Court for an Order pursuant to Section 21D(a)(3)(B)(v) of the Securities Exchange Act of 1934, 15 U.S.C. § 78u-4(a)(3)(B)(v), appointing him Lead Plaintiff and approving his selection of the law firm of Murray, Frank & Sailer LLP as Lead Counsel for the Class.

Movant makes this motion based on the complaints filed herein, the Memorandum of Law submitted contemporaneously herewith, the Declaration of Brian Brooks in Support of the Movant’s Motion to Consolidate, to be Appointed Lead Plaintiff, and for Approval of his Selection of Lead Counsel, executed on December 10, 2007, and on all other pleadings, motions, and orders in this action.

Dated: December 10, 2007
New York, New York

MURRAY, FRANK & SAILER LLP

By: _____ /s/
Brian D. Brooks (BB- 7442)
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New York, NY 10016
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Proposed Lead Counsel for the Class